REMARKS/ARGUMENTS

Applicant thanks the Examiner for the Interview held on May 16, 2005 and for indicating that the proposed amendments to claim 1 overcome the art of record.

Claims 1-24 are pending. By this amendment, claims 1, 9, 15, and 20 are amended. Claim 20 is amended to correct a typographical error. Support for the claim amendment can be found at least in Figure 4 and at page 4, lines 1-8 and page 5, lines 15-17, and page 6, lines 5-9 of the specification. No new matter is introduced. Reconsideration and prompt allowance of the claims is respectfully requested.

35 U.S.C. § 102 Rejections

Claims 1-20, 22, and 24 are rejected under 35 U.S.C. § 102 (b) as being unpatentable over Kimberley Burchett "http://www.kimbly.com/code/dnd/index.html" (hereafter Burchett). This rejection is respectfully traversed.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. Of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the ... claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). There must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention. *Scripps Clinic Research & Foundation v. Genentech Inc.*, 18 USPQ2d 1001, 1010 (Fed. Cir. 1991).

Burchett is directed to cross-frame drag and drop operations. However, as agreed upon during the Interview, Burchett does not disclose or suggest dragging a ghost image of a dragging object. Therefore, Burchett does not disclose or suggest "displaying a drag image approximate the mouse cursor using the custom glass pane, wherein the drag image is a ghost image of the dragging object and moves with the mouse cursor, and wherein the ghost image disappears after the drag and drop operation," as recited in amended claim 1.

Moreover, Burchett cannot be combined with references that are directed to drag and drop operations in Microsoft Windows. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art (see MPEP 2143.01; *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992)). There is no explicit or implicit teaching, suggestion or motivation in the cited prior art, or from the knowledge generally

available to one of ordinary skill in the art at the time of the invention, to apply drag and drop operations in Microsoft Windows to Java applications. Specifically, there is no teaching, suggestion or motivation to incorporate the feature of dragging a ghost image into Burchett's system. Any such assertion would be based on impermissible hindsight. Since the cited references do not disclose or suggest all of the features of amended claim 1, claim 1 is allowable.

Claims 2-8 and 22 are allowable at least because they depend from allowable claim 1 and for the additional features they recite.

With respect to claim 9, for at least the same reasons as discussed with respect to claim 1, Burchett does not disclose or suggest "the custom glass pane displays a drag image approximate the mouse cursor, wherein the drag image is a ghost image of the dragging object and moves with the mouse cursor, and wherein the ghost image disappears after the drag and drop operation," as recited in amended claim 9. Therefore, claim 9 is allowable.

Claims 10-14 and 24 are allowable at least because they depend from allowable claim 9 and for the additional features they recite.

With respect to claim 15, for at least the same reason as discussed with respect to claim 1, Burchett does not disclose or suggest "displaying a drag image approximate the mouse cursor using the custom glass pane, wherein the drag image is a ghost image of the dragging object and moves with the mouse cursor, and wherein the ghost image disappears after the drag and drop operation," as recited in amended claim 15. Therefore, claim 15 is allowable.

Claims 16-20 are allowable at least because they depend from allowable claim 15 and for the additional features they recite.

Withdrawal of the rejection of claims 1-20, 22, and 24 under 35 U.S.C. §102 (b) is respectfully requested.

35 U.S.C. § 103 Rejections

Claims 21 and 23 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over Burchett in view of U.S. Patent 6,549,218 to Gershony et al. (hereafter Gershony). This rejection is respectfully traversed.

Gershony is directed to a method of displaying multiple windows of information on a computer display screen. However, Gershony does not cure Burchett's defect and does not disclose or suggest dragging a ghost image of a dragging object. Therefore, independent claims 1 and 9 are allowable over Burchett and Gershony.

Claims 21 and 23 are allowable at least because they depend from allowable claims 1 and 9, respectively, and for the additional features they recite. Withdrawal of the rejection of claims 21 and 23 under 35 U.S.C. §103 (a) is respectfully requested.

In view of the above remarks, Applicant respectfully submits that the application is in condition for allowance. Prompt examination and allowance are respectfully requested.

Should the Examiner believe that anything further is desired in order to place the application in even better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

Date: **June 14, 2005**

Kelly T. Lee
Registration No. 47,743
Andrews Kurth LLP
1701 Pennsylvania Ave, N.W.
Suite 300
Washington, DC 20006
Tel. (202) 662-2736
Fax (202) 662-2739